

ORIGINAL

RECEIVED

BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

JUL 11 1994

FEDERAL COMMUNICATIONS COMMISSION
U.S. DEPARTMENT OF COMMERCE

DOCKET FILE COPY ORIGINAL

| | | |
|----------------------------|---|----------------------|
| In the Matter of |) | |
| |) | |
| Implementation of Sections |) | GN Docket No. 93-252 |
| 3(n) and 332 of the |) | |
| Communications Act, |) | |
| Regulatory Treatment of |) | |
| Mobile Services |) | |

To: The Commission

**REPLY COMMENTS OF
CELLCALL, INC.**

Carl W. Northrop
E. Ashton Johnston

Its Attorneys

BRYAN CAVE
700 Thirteenth Street, N.W.
Suite 700
Washington, D.C. 20005-3960
(202) 508-6000

July 11, 1994

No. of Copies rec'd 004
List A B C D E

TABLE OF CONTENTS

| | |
|--|----|
| Summary | ii |
| I. Preliminary Statement. | 1 |
| II. The Commission Must Adopt Technical and Operational Rules for 800 MHz SMR Licensees that Are Comparable to Rules for Other CMRS Providers | 4 |
| A. Wide-Area SMR Licensing | 4 |
| B. Loading Standards Should Be Eliminated. | 8 |
| C. System Construction and Operation | 10 |
| III. The Commission Should Not Adopt a CMRS Spectrum Cap. | 11 |
| IV. Conclusion | 13 |

SUMMARY

CellCall, Inc. ("CellCall") hereby submits its reply to the Comments tendered in response to the Further Notice of Proposed Rule Making in GN Docket No. 93-252, Implementation of Sections 3(n) and 332 of the Communications Act, Regulatory Treatment of Mobile Services. CellCall is an owner and operator of specialized mobile radio ("SMR") systems and has requested Commission authorization to establish a wide-area enhanced SMR system using digital technology.

The Commission has tentatively concluded that the type of wide-area system that CellCall seeks to implement is substantially similar to cellular service. Therefore, the Commission must adopt rules that subject such systems to comparable regulatory treatment. In its Reply Comments, CellCall supports the adoption of a licensing plan whereby wide-area SMR systems are issued for contiguous channel blocks on an MTA basis. CellCall also supports elimination of loading requirements and the 40-mile rule, adoption of construction requirements comparable to other CMRS services, and rejection of the CMRS spectrum cap.

BEFORE THE
Federal Communications Commission

WASHINGTON, D.C. 20554

RECEIVED

JUL 11 1994

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of)
)
Implementation of Sections) GN Docket No. 93-252
3(n) and 332 of the)
Communications Act,)
Regulatory Treatment of)
Mobile Services)

To: The Commission

**REPLY COMMENTS OF
CELLCALL, INC.**

CellCall, Inc. ("CellCall"), by its attorneys,
hereby replies to the Comments filed in response to the
Further Notice of Proposed Rule Making (the "Further NPRM")
in GN Docket No. 93-252, Implementation of Sections 3(n) and
332 of the Communications Act, Regulatory Treatment of
Mobile Services, released May 20, 1994. In support hereof,
the following is respectfully shown:

I. Preliminary Statement

1. CellCall owns and operates both traditional
and trunked specialized mobile radio ("SMR") stations
throughout a three-state area in the midwestern United
States and has applied for authorization to provide wide-
area enhanced SMR ("ESMR") service in this region. This
reply is limited to issues affecting the SMR service that
were raised in the Further NPRM and commented upon in the

initial comments directed thereto, with particular emphasis on the technical, operational, and licensing rules applicable to wide-area SMR service.

2. As the Commission is aware, the SMR industry has in recent years undergone a great deal of geographic market expansion through licensing, management agreements, and corporate consolidation. In the process, certain licensees have expressed an interest in aggregating large channel blocks and using advanced technologies to increase system capacity, thereby enabling wide geographic areas to be served efficiently. These SMR operators on occasion have requested waivers of various Commission rules to permit them to construct advanced spectrally-efficient ESMR systems that would increase system capacity and permit wide-area roaming.¹ The Commission also has adopted rules that expressly authorize extended implementation periods for such operators.²

3. In the Second Report and Order in this docket, the Commission determined that wide-area SMR service should be reclassified as a Commercial Mobile Radio Service ("CMRS").³ Having made this determination, the Commission

^{1/} The first of these waivers was granted to Nextel Communications (formerly Fleet Call, Inc.). See Fleet Call, Inc., 6 FCC Rcd. 1533 (1991).

^{2/} See 47 C.F.R. § 90.629.

^{3/} Implementation of Sections 3(n) and 332 of the Communications Act, Regulatory Treatment of Mobile Services, 9 FCC Rcd. 1411 (1994).

has a statutory obligation to ensure that reclassified private land mobile licensees, including SMR licensees, "are subject to technical requirements that apply to licensees that are providers of substantially similar common carrier services."⁴

4. In the Further NPRM, the Commission proposed to determine whether services are substantially similar based "primarily on whether the CMRS providers in question compete to meet similar customer demands for service."⁵ The Commission tentatively concluded that wide-area SMR service is substantially similar to common carrier cellular service.⁶ However, the Commission also acknowledged that many of its rules governing 800 MHz SMRs impose burdens that do not exist for cellular carriers.⁷ These rules, which generally act as an impediment to the ability of CellCall and other wide-area SMR providers to compete with CMRS, must be changed if the Commission's determination that wide-area SMR and cellular service compete to provide similar service to customers is to have any validity.

^{4/} 47 U.S.C. § 332(d)(3) (1993).

^{5/} Further NPRM at para. 5.

^{6/} Id. at para. 15.

^{7/} See, e.g., Further NPRM at paras. 26-27 (discussion of channel assignments and service areas); 71 (discussion of loading requirements); 72 (discussion of the 40-mile rule).

**II. The Commission Must Adopt Technical and Operational
Rules for 800 MHz SMR Licensees that Are
Comparable to Rules for Other CMRS Providers**

5. As noted, the Commission has acknowledged that its present 800 MHz SMR technical, operational, and licensing rules subject wide-area SMR carriers to different regulatory treatment than other CMRS providers. Consequently, to the extent that wide-area operators provide a service that is substantially similar to other CMRS offerings, these rules must be changed.

A. Wide-Area SMR Licensing

6. The Further NPRM noted that the "most basic" technical rules concern channel assignment and service area. Consequently, the Commission requested comment on what rules should be adopted to ensure that the licensing of 800 MHz wide-area SMRs is consistent with the statutory goal of achieving comparable technical rules for substantially similar services.⁸ The Further NPRM set out two alternatives for licensing wide-area SMRs: a defined service area based on the Rand-McNally Major Trading Areas ("MTA"), and a self-defined service area based on licensees' and applicants' self-designation of geographic coverage areas.⁹

^{8/} See Further NPRM at para. 32.

^{9/} See id. at paras. 32-33.

7. The Comments express broad support for licensing wide-area SMRs on a defined service area basis.¹⁰ However, no consensus on the details of such a plan emerged from the various Comments that addressed this issue.¹¹ Nonetheless, several parties, all of whom will be directly affected by any such change, as will CellCall, indicated a willingness to work with other affected industry members to devise a comprehensive wide-area 800 MHz licensing plan.¹²

8. Since initial comments on the Further NPRM were filed, CellCall and other members of AMTA's Digital Switched Network Council, which represents the interests of numerous wide-area SMR system operators, many of whom are active participants in this proceeding, have reached consensus on a plan for licensing wide-area 800 MHz SMRs. Under this plan, a licensee would be authorized to provide service on an MTA basis utilizing a contiguous band of spectrum.

^{10/} See Comments of American Mobile Telecommunications Association ("AMTA") at 15; Nextel Communications, Inc. ("Nextel") at 14-15; OneComm Corporation ("OneComm") at 5; Pittencrief Communications, Inc. ("Pittencrief") at 6. Indeed, the Commission already has a substantial record on which to base a finding that MTAs are the optimal service areas for wide-area SMRs. See Comments in PR Docket No. 93-144, Amendment of Part 90 of the Commission's Rules to Facilitate Future Development of SMR Systems in the 800 MHz Frequency Band.

^{11/} See, e.g., Comments of Nextel at 6-21; OneComm at 3-7; Dial Page, Inc. ("Dial Page") at 7; Pittencrief at 5-8; AMTA at 14-16.

^{12/} See Comments of AMTA at 15-16; OneComm at 7; Dial Page at 7.

9. The first key component of this plan calls for a defined service area. The plan adopts the alternative originally proposed in the Commission's 800 MHz EMSP Notice¹³ and restated in the Further NPRM.¹⁴ A single wide-area 800 MHz SMR system license would be granted for each MTA. Eligibility to hold the license would be limited to those entities who satisfy the Commission's standards for receiving authorization to establish a wide-area system and who are (1) a wide-area 800 MHz SMR licensee currently authorized to operate within that MTA and/or (2) a wide-area 800 MHz SMR applicant whose application to serve any area within the MTA is pending as of August 10, 1994.¹⁵ For any MTA in which this eligibility threshold entitles more than one entity to hold the license, all such eligible parties

^{13/} Notice of Proposed Rule Making, Amendment of Part 90 of the Commission's Rules to Facilitate Future Development of SMR Systems in the 800 MHz Frequency Band, 8 FCC Rcd. 3950 (1993), para. 15.

^{14/} Further NPRM at para. 31.

^{15/} Establishing a date-certain will enable Commission staff to speed processing of pending wide-area filings, and also will protect against the possibility that the Commission would be flooded with new requests for wide-area authorizations. As the Commission acknowledged in the Further NPRM, "the 800 MHz band [has] become heavily occupied in virtually all major markets and in many secondary markets and rural areas as well." Further NPRM at para. 32. Thus, establishing a cut-off date of August 11, 1994 for filing wide-area SMR applications should not prejudice any party. To discourage speculative filings, however, applicants filing between July 11, 1994 and August 10, 1994, should be required to include a significant minimum number of discrete channels in order to be granted a wide-area authorization.

would be free to negotiate the terms and conditions pursuant to which a single entity ultimately would receive the MTA license. In the absence of such an agreement, the Commission's existing rules governing wide-area SMR systems would apply.¹⁶

10. Without a clear block of contiguous spectrum, wide-area SMR operators cannot be considered to be competing with cellular carriers. Thus, the second key component of the 800 MHz wide-area licensing plan provides that, once granted, the MTA license would authorize the exclusive use of a contiguous block of 200 channels that are presently allocated to the SMR service.¹⁷ Traditional SMR systems operating on these channels would be subject to mandatory

^{16/} According to Nextel, "it is highly doubtful that any market can economically support more than one ESMR, particularly given the onset of digital cellular, the creation of PCS, and the coming implementation of satellite-based wireless telecommunications systems. By and large, firms pursuing the ESMR initiative unilaterally have established distinct, non-overlapping service areas. Accordingly, in most areas of the country the assignment of ESMR spectrum blocks will be a non-issue for the Commission." Comments of Nextel at 16.

^{17/} The 800 MHz private land mobile spectrum is divided into 600 25 kHz channels in the 806-821/851-866 MHz bands. Of these 600 channels, 280 are available for trunked SMR systems, including the 200 contiguous SMR Category channels from 401-600 that would be authorized under an MTA license. The remaining 80 SMR channels are interspersed between channels 151-400. The General Category channels from 1-150 are available to SMR systems under certain conditions. See 47 C.F.R. §§ 90.613, 90.615.

relocation to channels 1-400. The MTA licensee would be responsible for all expenses associated with the relocation.

11. CellCall endorses this plan as a necessary means toward achieving substantial similarity between the channel assignment and service area rules for wide-area SMR service and other wide-area CMRS, and toward eliminating the severe backlog in processing filings for wide-area SMR authorizations presently pending before the Private Radio Bureau. In this regard, CellCall agrees with AMTA that the potential of wide-area SMRs to provide service that is substantially similar to cellular service can be realized only if the Commission modifies its regulatory structure to provide for the major aspects of this plan -- defined service areas and clear contiguous spectrum.¹⁸

B. Loading Standards Should Be Eliminated

12. As outlined in the Further NPRM, wide-area SMR licensees must meet loading requirements in order to obtain exclusive channel use, to obtain additional channels, to serve areas within 40 miles of existing stations, and to avoid automatic cancellation of unloaded channels after five years.¹⁹ In the Further NPRM, the Commission acknowledged that similar restrictions are not imposed on either cellular

^{18/} See Comments of AMTA at i.

^{19/} Further NPRM at para. 68 (citing 47 C.F.R. §§ 90.631(a), 90.631(c), 90.627(b), 90.631(b)).

carriers or PCS providers.²⁰ The Commission therefore proposed to eliminate loading requirements for wide-area SMR systems.²¹

13. The Comments overwhelmingly support elimination of loading requirements.²² CellCall agrees. CellCall intends to convert constructed analog systems into a wide-area system employing spectrally efficient advanced digital technologies. Loading requirements produce a result completely at odds with this goal, by forcing wide-area SMR operators wishing to implement efficient digital technology to first load their systems with less efficient analog units that would then be deloaded as the digital conversion takes place. Moreover, the requirements unfairly burden operators who provide interconnected service to customers. Interconnected communications typically are longer than non-interconnected communications, and operators thus must limit the number of customers to whom they provide interconnected service in order to satisfy the loading rules.

14. CellCall also supports the Commission's proposal to eliminate Section 90.627(b) of the Commission's rules,²³ the "40-mile rule," which generally prohibits a

^{20/} Id. at paras. 68, 71.

^{21/} Id. at para. 70.

^{22/} See, e.g., Comments of AMTA at 12; Pittencrief at 11-12; Nextel at 20; E.F. Johnson at 17-18; Geotek at 21; Brown and Schwaninger at 13.

^{23/} Further NPRM at para. 72.

trunked SMR licensee from receiving authorization for another trunked station within 40 miles of the existing station unless loading requirements are satisfied. Elimination of this rule will permit wide-area SMR operators to complete acquisitions without regard to the 40-mile rule and to construct systems in a small cell configuration utilizing advanced switching techniques and frequency reuse in order to provide high quality service that has the potential to be competitive with other CMRS.

15. In sum, CellCall agrees with AMTA that the competitive disadvantages of loading requirements far outweigh the benefits they previously offered.²⁴ As the Commission has properly recognized, the primary concern behind the loading requirement, spectrum warehousing, can be addressed through other means such as construction timetables and coverage requirements.²⁵

C. System Construction and Operation

16. In the Further NPRM the Commission properly found that "requiring wide-area SMR licensees to

^{24/} See Comments of AMTA at 12.

^{25/} Further NPRM at para. 72. As Nextel notes, "establishing an ESMR block license would permit the Commission to eliminate the 40-mile rule and loading requirements for ESMR systems. This ensures ESMRs comparable regulation with cellular. In a blocked channel, geographic service environment, spectrum warehousing would no longer be an issue thus eliminating the need for the 40-mile rule." Comments of Nextel at 20.

affirmatively justify their construction timetables in order to obtain an extended implementation period constitutes a burden that is not imposed on cellular and PCS licensees," and requested comment on whether a fixed construction period should be adopted.²⁶

17. Although a twelve-month construction period is adequate for traditional SMR stations, amendment of the construction requirements for ESMR systems is justified. The purpose, size, and complexity of such wide-area systems requires longer than one year to plan, approve, construct, and place in operation. Consequently, CellCall supports Pittencrief's proposal that the Commission adopt rules similar to those for cellular service, and permit wide-area SMR operators five years to construct their systems within an MTA. Areas that remain unserved after five years would be relicensed.²⁷ CellCall also supports the suggestion by Nextel that the Commission eliminate the requirement that licensees obtain prior approval for every system modification within the service area.²⁸

III. The Commission Should Not Adopt A CMRS Spectrum Cap

18. In the Further NPRM, the Commission tentatively adopted a 40 MHz limit on the amount of spectrum

^{26/} Further NPRM at paras. 64-65.

^{27/} See Comments of Pittencrief at 11.

^{28/} See Comments of Nextel at 20.

a single CMRS provider may hold within a given geographic service area.²⁹ The Comments overwhelmingly oppose such a cap. Indeed, nearly every commenter addressing this issue, from all segments of the communications industry, generally rejected the Commission's reasoning that such a cap is necessary to prevent the accumulation of excessive market power.³⁰ CellCall agrees with the comments that oppose the application of a spectrum cap to the 800 MHz SMR frequencies, and urges the Commission not to adopt the proposed cap.

^{29/} Further NPRM at para. 93.

^{30/} See, e.g., Comments of AMTA at 28-34; OneComm at 7-14. See also Comments of Air Spectrum III, Inc.; Celpage, Inc.; Century Cellunet, Inc.; Constellation Communications, Inc.; CTIA; Comcast Corporation; Dial Page, Inc.; GTE; Loral/Qualcomm Partnership; McCaw Cellular Communications, Inc.; Metrocall, Inc.; NABER, Inc.; Network USA; New Par; Nextel; Pagemart, Inc.; Paging Network, Inc.; Pittencrief; Ram Mobile Data USA, L.P.; Roseville Telephone; Rural Cellular Association; SMR Systems, Inc.; Southwestern Bell Corporation; TRW, Inc.

IV. Conclusion

WHEREFORE, the foregoing premises duly considered, CellCall requests that the Commission adopt rules in this proceeding consistent with the foregoing.

Respectfully submitted,

CELLCALL, INC.

By: 

Carl W. Northrop
E. Ashton Johnston

Its Attorneys

BRYAN CAVE
700 Thirteenth Street, N.W.
Suite 700
Washington, D.C. 20005-3960
(202) 508-6000

July 11, 1994

CERTIFICATE OF SERVICE

I, Tana Christine Maples, hereby certify that I have this 11th day of July, 1994, caused copies of the foregoing **Reply Comments of CellCall, Inc.** to be delivered by hand, courier charges prepaid, and by first class mail, postage prepaid, to the following:

Ralph A. Haller
Private Radio Bureau
Federal Communications Commission
2025 M Street, N.W., Room
Washington, DC 20554

John Cimko, Jr.
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W., Room 644
Washington, DC 20554

Beverly G. Baker
Private Radio Bureau
Federal Communications Commission
2025 M Street, N.W., Room 5002
Washington, DC 20554

Peter Batacan
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W., Room 659
Washington, DC 20554

David L. Furth
Private Radio Bureau
Federal Communications Commission
2025 M Street, N.W., Room 5202
Washington, DC 20554

Judith Argentieri
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W., Room 518
Washington, DC 20554

Richard Metzger
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W., Room 500
Washington, DC 20554

Air Spectrum III, Inc.
William J. Franklin
Law Offices of William J. Franklin
1919 Pennsylvania Ave., N.W.
Suite 300
Washington, DC 20006-3404

Gerald P. Vaughan
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W., Room 500
Washington, DC 20554

American Mobile Satellite Corporation
Bruce D. Jacobs
Glenn S. Richards
Fisher, Wayland, Cooper, Leader
& Zaragoza, L.L.P.
2001 Pennsylvania Ave., N.W.
Suite 400
Washington, DC 20006

Myron C. Peck
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W., Room 644
Washington, DC 20554

American Mobile Satellite Corporation
Lon C. Levin
Vice President and Regulatory Counsel
American Mobile Satellite Corporation
10802 Parkridge Boulevard
Reston, Virginia 22091

American Mobile Telecommunications Association, Inc.
Mr. Alan R. Shark
President
1150 18th Street, N.W.
Suite 250
Washington, D.C. 20036

American Mobile Telecommunications Association, Inc.
Elizabeth R. Sachs, Esq.
Lukas, McGowan, Nace & Gutierrez
1819 H Street, N.W.
Suite 700
Washington, D.C. 20006

American Personal Communications
Mr. J. Barclay Jones
Vice President for Engineering
1025 Connecticut Ave., N.W.
Washington, D.C. 20036

American Petroleum Institute
Wayne V. Black
Joseph M. Sandri, Jr.
Keller and Heckman
1001 G Street, N.W.
Suite 500 West
Washington, D.C. 20001

The Bell Atlantic Companies
John T. Scott, III
Charon J. Harris
Crowell & Moring
1001 Pennsylvania Ave., N.W.
Washington, D.C. 20004

BellSouth Corporation
BellSouth Telecommunications, Inc.
BellSouth Cellular Corp.
BellSouth Wireless, Inc.
Mobile Communications Corporation of America
William B. Barfield
Jim O. Llewellyn
1155 Peachtree Street, N.E.
Atlanta, Georgia 30309-3610

BellSouth Corporation
BellSouth Telecommunications, Inc.
BellSouth Cellular Corp.
BellSouth Wireless, Inc.
Mobile Communications Corporation of America
Charles P. Featherstun
David G. Richards
1133 21st Street, N.W.
Washington, D.C. 20036

Brown and Schwaninger
Dennis C. Brown
Robert H. Schwaninger, Jr.
1835 K Street, N.W.
Suite 650
Washington, D.C. 20006

Celpage, Inc.
Frederick M. Joyce
Christine McLaughlin
Joyce & Jacobs
2300 M Street, N.W.
Suite 130
Washington, D. C. 20037

Century Cellunet, Inc.
Mr. W. Bruce Hanks
President
100 Century Park Avenue
Monroe, LA 71203

**Committee for Effective
Cellular Rules**

William J. Franklin
Law Offices of William J. Franklin
1919 Pennsylvania Ave., N.W.
Suite 300
Washington, DC 20006-3404

**Constellation Communications,
Inc.**

Robert A. Mazer
Nixon, Hargrave, Devans & Doyle
One Thomas Circle, N.W.
Suite 800
Washington, D.C. 20005

**Cellular Telecommunications
Industry Association**

Mr. Michael F. Altshcul
Randall S. Coleman
1250 Connecticut Avenue, N.W.
Suite 200
Washington, D.C. 20036

Comcast Corporation

Leonard J. Kennedy
Laura H. Phillips
Richard S. Denning
Dow, Lohnes & Albertson
1255 23rd Street, N.W.
Washington, D.C. 20037

Dial Page, Inc.

Gerald S. McGowan
George L. Lyon, Jr.
Lukas, McGowan, Nace & Gutierrez
1819 H Street, N.W.
Suite 700
Washington, D.C. 20006

The E. F. Johnson Company

Russell H. Fox
A.B. Cruz III
Gardner, Carton & Douglas
1301 K Street, N.W.
Suite 900 East Tower
Washington, D.C. 20005

The Ericsson Corporation

David C. Jatlow
Young & Jatlow
2300 N Street, N.W.
Suite 600
Washington, D.C. 20037

Geotek Communications, Inc.

Michael Hirsch
Vice President-External Affairs
1200 19th Street, N.W.
Suite 607
Washington, D.C. 20036

**Global Cellular
Communications, Inc.**

Robyn G. Nietert
Scott C. Cinnamon
Brown Nietert & Kaufman
1920 N Street, N.W.
Suite 660
Washington, D.C. 20036

GTE Service Corporation

Gail L. Polivy
1850 M Street, N.W.
Suite 1200
Washington, D.C. 20036

**Industrial Telecommunications
Association/Council of
Independent Communication
Suppliers**

Mr. Mark E. Crosby
Duncan Kennedy, III
c/o Frederick J. Day, Esq.
1110 N. Glebe Road
Suite 500
Arlington, VA 22201-5720

LegalCom Services, Inc.

William J. Franklin
Law Offices of William J. Franklin
1919 Pennsylvania Ave., N.W.
Suite 300
Washington, DC 20006-3404

**Loral/Qualcomm Partnership,
L.P.**

William D. Wallace
Crowell & Moring
1001 Pennsylvania Ave., N.W.
Washington, D.C. 20004-2595

**Loral/Qualcomm Partnership,
L.P.**

Leslie A. Taylor
Leslie Taylor Associates
6800 Carlynn Court
Bethesda, MD 20817-4302

**McCaw Cellular Communications,
Inc.**

Cathleen A. Massey
1150 Connecticut Ave., N.W.
4th Floor
Washington, D.C. 20036

Metrocall, Inc.

Frederick M. Joyce
Christine McLaughlin
Joyce & Jacobs
2300 M Street, N.W.
Suite 130
Washington, D. C. 20037

Motorola, Inc.

Mary Brooner
Manager, Wireless Regulatory Policies
1350 I Street, N.W.
Washington, D.C. 20005

**National Association of
Business
and Educational Radio, Inc.**

David E. Weisman
Alan S. Tilles
Meyer, Faller, Weisman and
Rosenberg, P.C.
4400 Jenifer Street, N.W.
Suite 380
Washington, D.C. 20015

Network USA

Frederick M. Joyce
Christine McLaughlin
Joyce & Jacobs
2300 M Street, N.W.
Suite 130
Washington, D. C. 20037

New Par

Thomas J. Casey
Jay L. Birnbaum
Timothy R. Robinson
Skadden, Arps, Slate, Meagher
& Flom
1440 New York Avenue, N.W.
Washington, D.C. 20006

Nextel Communications, Inc.

Robert S. Foosaner
Lawrence R. Krevor
Laura L. Holloway
800 Connecticut Ave., N.W.
Suite 1001
Washington, D.C. 20006

NYNEX Corporation

Edward R. Wholl
William J. Balcerski
120 Bloomingdale Road
White Plains, NY 10605

Omnipoint Communications, Inc.

Mark J. Tauber
Mark J. O'Connor
Piper & Marbury
1200 19th Street, N.W.
Seventh Floor
Washington, D.C. 20036

OneComm Corporation

Michael R. Carper
Vice President/General Counsel
4643 Ulster Street
Suite 500
Denver, CO 80237

PageMart, Inc.
Phillip L. Spector
Susan E. Ryan
Paul, Weiss, Rifkind, Wharton
& Garrison
1615 L Street, N.W.
Washington, D.C. 20036

Paging Network, Inc.
Judith St. Ledger-Roty
James J. Freeman
Marnie K. Sarver
John W. Hunter
Andrea S. Miano
Reed Smith Shaw & McClay
1200 18th Street, N.W.
Washington, D.C. 20036

PCC Management Corp.
William J. Franklin
Law Offices of William J. Franklin
1919 Pennsylvania Ave., N.W.
Suite 300
Washington, DC 20006-3404

**Personal Communications
Industry
Association**
Mark J. Golden
1019 19th Street, N.W.
Washington, D.C. 20554

**Pittencrieff Communications,
Inc.**
Terry J. Romine
Lukas McGowan Nace & Gutierrez
1819 H Street, N.W.
Seventh Floor
Washington, D.C. 20006

**Ram Mobile Data USA Limited
Partnership**
Henry Goldberg
Jonathan L. Wiener
Daniel S. Goldberg
Goldberg, Godles, Wiener & Wright
1229 19th Street, N.W.
Washington, D.C. 20036

Ram Technologies, Inc.
Frederick M. Joyce
Christine McLaughlin
Joyce & Jacobs
2300 M Street, N.W.
Suite 130
Washington, D. C. 20037

Roseville Telephone Company
George Petrutsas
Paul J. Feldman
Fletcher, Heald & Hildreth
1300 North 17th Street
Eleventh Floor
Rosslyn, VA 22209

Rural Cellular Association
Stephen G. Kraskin
Caressa D. Bennet
Kraskin & Associates
2120 L Street, N.W.
Suite 810
Washington, D.C. 20037

Russ Miller Rental
William R. Miller
dba, Russ Miller Rental
3620 Byers Avenue
Fort Worth, TX 76107

Sea, Inc.
Thomas J. Keller
Verner, Liipfert, Bernhard,
McPherson & Hand
901 15th Street, N.W.
Suite 700
Washington, D.C. 20005-2327

Simrom, Inc.

William J. Franklin
Law Offices of William J. Franklin
1919 Pennsylvania Ave., N.W.
Suite 300
Washington, DC 20006-3404

Smartlink Development Limited Partnership

Harold C. Davis
Executive Vice President/Business Development
1269 South Broad Street
Wallingford, CT 06492

SMR Systems, Inc.

William J. Franklin
Law Offices of William J. Franklin
1919 Pennsylvania Ave., N.W.
Suite 300
Washington, DC 20006-3404

The Southern Company

Carole C. Harris
Christine M. Gill
Tamara Y. Davis
Keller and Heckman
1001 G Street, N.W.
Suite 500 West
Washington, D.C. 20001

Southwestern Bell Corporation

Robert M. Lynch
Paula J. Fulks
175 E. Houston
Room 1218
San Antonio, TX 78205

Sprint Corporation

Jay C. Keithley
Leon Kestenbaum
1850 M Street, N.W.
Suite 1100
Washington, D.C. 20036

Sprint Corporation

Kevin Gallagher
8725 Higgins Road
Chicago, IL 60631

Sprint Corporation

Craig T. Smith
P.O. Box 11315
Kansas City, MO 64112

Suncom Mobile and Data, Inc.

Thomas Gutierrez
David A. LaFuria
Lukas, McGowan, Nace & Gutierrez
1819 H Street, N.W.
Suite 700
Washington, D.C. 20006

TRW Inc.

Norman P. Leventhal
Raul R. Rodriguez
Leventhal, Senter & Lerman
2000 K Street, N.W.
Suite 600
Washington, D.C. 20006

United States Sugar Corporation

Wayne V. Black
Dorothy E. Cukier
Keller and Heckman
1001 G Street, N.W.
Suite 500 West
Washington, D.C. 20001

US MobilComm, Inc.

Richard Rubin
Fleishman and Walsh
1400 16th Street, N.W.
Suite 600
Washington, D.C. 200036

US MobilComm, Inc.

Eliot J. Greenwald

Howard C. Griboff

Fisher Wayland Cooper Leader

& Zaragoza L.L.P.

2001 Pennsylvania Avenue, N.W.

Suite 400

Washington, D.C. 20006

U S West, Inc.

Donald M. Mukai

Jeffrey S. Bork

1020 19th Street, N.W.

Suite 700

Washington, D.C. 20036

**Utilities Telecommunications
Council**

Jeffrey L. Sheldon

Sean A. Stokes

1140 Connecticut Avenue, N.W.

Suite 1140

Washington, D.C. 20036

**Vanguard Cellular Systems,
Inc.**

Raymond G. Bender, Jr.

J. G. Harrington

Dow, Lohnes & Albertson

1255 23rd Street, N.W.

Suite 500

Washington, D.C. 20037

WJG Maritel Corporation

Russell H. Fox

Susan H.R. Jones

Gardner, Carton & Douglas

1301 K Street, N.W.

Suite 900 East Tower

Washington, D.C. 20005


Tana Christine Maples